

HBM2014R00034

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND

IN THE UNITED STATES DISTRICT COURT
~~FOR THE DISTRICT OF MARYLAND~~

CLERK'S OFFICE
AT BALTIMORE

UNITED STATES OF AMERICA

BY *[Signature]* : DEPUTY

CRIMINAL NO.: *RDB-14-0275*

v.

**RICHARD COLEMAN and
ARNOLD DORSEY,**

Defendants.

: (Conspiracy to Interfere with
Commerce by Robbery, 18 U.S.C. §
1951(a); Interference with
Commerce by Robbery, 18 U.S.C. §
1951(a); Using and Carrying a
Firearm During and In Relation to
a Crime of Violence, 18 U.S.C. §
924(c); Possession of a Firearm by a
Convicted Felon, 18 U.S.C. §
922(g)(1); Aiding and Abetting, 18
U.S.C. § 2)

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INDICTMENT

COUNT ONE

The Grand Jury for the District of Maryland charges that:

1. At all times material to this Indictment, the Rent-A-Center store located at 2332 Frederick Avenue, Baltimore, Maryland (herein the "Rent-A-Center") was a business engaged in interstate commerce because they have offices in multiple states and operate as an interstate chain engaged in retail sales of interstate goods and products obtained from vendors within and outside the state of Maryland, and as such was a businesses that affected interstate commerce.

2. On or about December 7, 2013, in the District of Maryland, the defendants,

**RICHARD COLEMAN and
ARNOLD DORSEY,**

did knowingly and willfully combine, conspire, confederate and agree with each other and with

others known and unknown to the Grand Jury to obstruct, delay and affect commerce as that term is defined in 18 U.S.C. § 1951, and the movement of articles and commodities in such commerce, by robbery as that term is defined in 18 U.S.C. § 1951.

Ways, Manner and Means of the Conspiracy

4. It was part of the conspiracy that **RICHARD COLEMAN** and **ARNOLD DORSEY** attempted to rob, at gunpoint, a commercial business of United States currency.

Overt Act

5. In furtherance of the conspiracy, and to affect the objects thereof, the defendants performed, participated in and did the following in the District of Maryland:

a. On or about December 7, 2013, at approximately 1:00 p.m. **RICHARD COLEMAN** and **ARNOLD DORSEY** did forcibly attempt to rob and steal, at gunpoint, from an employee of the Rent-A-Center, United States currency and commercial goods which were lawfully in the possession of said employee.

18 U.S.C. § 1951.

COUNT TWO

The Grand Jury for the District of Maryland further charges that:

1. The allegations of Paragraph 1 of Count One are incorporated here.
2. On or about December 7, 2013, in the District of Maryland,

**RICHARD COLEMAN and
ARNOLD DORSEY,**

the defendants herein, did knowingly and intentionally obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as that term is defined in Title 18, United States Code § 1951, and the movement of articles and commodities in such commerce, by robbery as that term is defined in Title 18, United States Code, § 1951, in that the defendants did unlawfully attempt to take property consisting of consumer products and United States currency from the persons of employees of the Rent-A-Center, against their will, by means of actual and threatened force, violence, and fear of injury to their persons and by threatening serious physical injury and death to said employees by means of a firearm and deadly weapon.

18 U.S.C. § 1951.
18 U.S.C. § 2

COUNT THREE

The Grand Jury for the District of Maryland further charges that:

On or about December 7, 2013, in the District of Maryland,

**RICHARD COLEMAN and
ARNOLD DORSEY,**

the defendants herein, did knowingly use, carry and brandish firearms during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, conspiracy to interfere with commerce by robbery, and interference with commerce by robbery, as more fully set forth in Counts One and Two of this Indictment.

18 U.S.C. § 924(c)(1)(A)(i) and (ii)

18 U.S.C. § 2

COUNT FOUR

The Grand Jury for the District of Maryland further charges that:

On or about December 7, 2013, in the District of Maryland,

RICHARD COLEMAN,

the defendant herein, having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly and unlawfully possess a .40 caliber Glock semi-automatic pistol with serial number ERB021 and ammunition therein, in and affecting commerce.

18 U.S.C. § 922(g)(1)

18 U.S.C. § 2

COUNT FIVE

The Grand Jury for the District of Maryland further charges that:

On or about December 7, 2013, in the District of Maryland,

ARNOLD DORSEY,

the defendant herein, having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly and unlawfully possess a 10mm Colt semi-automatic pistol with serial number DG05518 and ammunition therein, in and affecting commerce.

18 U.S.C. § 922(g)(1)

18 U.S.C. § 2

FORFEITURE ALLEGATION

The Grand Jury for the District of Maryland further charges that:

1. Pursuant to Rule 32.2, Fed. R. Crim. P., notice is hereby given to the defendants that the United States will seek forfeiture as part of any sentence in accordance with Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c), as a result of the defendant's conviction under Counts One through Five of the Indictment.
2. As a result of the offenses alleged in Counts One through Five of this Indictment, the defendant,

**RICHARD COLEMAN and
ARNOLD DORSEY,**

shall forfeit to the United States the firearm involved in the commission of the offense, to wit, one 10mm Colt semi-automatic pistol with serial number DG05518 and ammunition therein and one .40 caliber Glock semi-automatic pistol with serial number ERB021 and ammunition therein.

18 U.S.C. § 924(d)

28 U.S.C. § 2461(c)

Rod J Rosenstein *MSE*
Rod J. Rosenstein
United States Attorney

A TRUE BILL:

SIGNATURE REDACTED

Foreperson

Date

6-5-14